

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA - LAFAYETTE DIVISION

GOLDMAN SACHS BANK USA,

Plaintiff,

v.

**MICHEL B. MORENO, TIFFANY C.
MORENO, MBM 2011 DOH GRANTOR
RETAINED ANNUITY TRUST, TCM 2011
DOH GRANTOR RETAINED ANNUITY
TRUST, MBM 2011 MGH GRANTOR
RETAINED ANNUITY TRUST, TCM 2011
MGH GRANTOR RETAINED ANNUITY
TRUST, MORENO PROPERTIES TWO,
LLC, AND NICHOLSON ESTATES,
L.L.C.,**

Defendants.

CIVIL CASE NO. 15-2018

JUDGE REBECCA F. DOHERTY

MAGISTRATE JUDGE C. MICHAEL HILL

MOTION TO APPOINT KEEPER¹

NOW INTO COURT, through undersigned counsel, comes Goldman Sachs Bank USA (“**Lender**”), plaintiff herein, and represents:

1.

Simultaneously with the filing of this Motion to Appoint Keeper, Lender has also filed a Motion to Strike the Answer, and a Motion to Maintain the Executory Proceeding, Reconsider

¹ All capitalized terms have the same meaning ascribed to them in the Verified Complaint (Rec. Doc. No. 1).

the Court's Ruling, and Issue the Writ of Seizure and Sale, seeking, among other things, the seizure of the Port Road Property and Nicholson Estates Property and the UCC collateral (the "**Mortgaged Property**") pursuant to a writ of seizure and sale issued herein.

2.

Pursuant to LA. REV. STAT. § 9:5136, et seq., Lender desires the appointment of a keeper of the Mortgaged Property during these proceedings, and Lender hereby requests that the U.S. Marshals Service, pursuant to this Court's order, appoint Latter & Blum Property Management, Inc. ("**Keeper**"), as keeper of the Mortgaged Property during these proceedings.

3.

Lender files herewith its memorandum in support of the relief requested.

WHEREFORE, Plaintiff, Goldman Sachs Bank USA requests that the Court order the U.S. Marshals Service to appoint Latter & Blum Property Management, Inc. as keeper of the Mortgaged Property.

Respectfully submitted

/s/ Laura F. Ashley

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Attorneys for Goldman Sachs Bank USA

CERTIFICATE OF SERVICE

I hereby certify that a copy of the *Motion to Appoint Keeper* was served by U.S. Mail, postage prepaid, on William E. Steffes, Steffes, Vingiello & McKenzie, LLC, 13702 Coursey Blvd., Building 3, Baton Rouge, LA 70817, on this 11th day of August, 2015, and by ECF filing.

/s/ Laura F. Ashley